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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re: Chapter 11

DELPHI CORPORATION, et al., Case No. 05-44481 (RDD)

Debtors.

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HUTCHINSON FTS INC.'S RESPONSE TO DEBTORS' TWENTY-SECOND OMNIBUS OBJECTION TO CERTAIN CLAIMS

Hutchinson FTS Inc. ("<u>Hutchinson</u>"), by and through its undersigned counsel, responds to the debtors' Twenty-Second Omnibus Objection to Certain Claims (the "<u>Twenty-Second Omnibus Objection</u>") as to Hutchinson's proof of claim, as follows:

1. Hutchinson filed Claim #13967 (the "<u>Proof of Claim</u>") in the total amount of \$283,429.97, representing the amounts due Hutchinson for goods sold to the above-referenced debtors (the "<u>Debtor</u>"). ¹

{00023318.2 / 0153-001}

¹ Hutchinson asserts this claim against all of the Debtors that are jointly-administered under case number 05-44481: Delphi Corporation 05-44481; Delphi NY Holding Corporation 05-44480; ASEC Manufacturing General Partnership 05-44482; ASEC Sales General Partnership 05-44484; Environmental Catalysts, LLC 05-44503; Delphi Medical Systems Colorado Corporation 05-44507; Delphi Medical Systems Texas Corporation 05-44511; Delphi Medical Systems Corporation 05-44529; Specialty Electronics International Ltd. 05-44536; Specialty Electronics, Inc. 05-44539; Delphi Liquidation Holding Company 05-44542; Delphi Electronics (Holding) LLC 05-44547; Delphi Technologies, Inc. 05-44554; Delphi Automotive Systems Tennessee, Inc. 05-44558; Delphi Mechatronic Systems, Inc. 05-44567; Delphi Automotive Systems Risk Management Corp. 05-44570; Exhaust Systems Corporation 05-44573;

- 2. On October 26, 2007 the Debtor filed its Twenty-Second Omnibus Objection to Claims, listing the Proof of Claim on Exhibit F-1 to the Twenty-Second Omnibus Objection to Claims, as a claim subject to modification. The Debtors request that the Proof of Claim be allowed against the Debtors' estates as a general unsecured claim in the amount of \$274,165.
- 3. Although Hutchinson's claim was filed in the amount of \$283,429.97, upon receipt of the Twenty-Second Omnibus Objection Hutchinson has reviewed its records and has agreed that the Proof of Claim should be allowed as listed on Schedule F-1 to the Twenty-Second Omnibus Objection.
- 3. The address to which the Debtors must deliver any reply to this response is:

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Delphi China LLC 05-44577; Delphi Automotive Systems Korea, Inc. 05-44580; Delphi International Services, Inc. 05-44583; Delphi Automotive Systems Thailand, Inc. 05-44586; Delphi Automotive Systems International, Inc. 05-44589; Delphi International Holdings Corp. 05-44591; Delphi Automotive Systems Overseas Corporation 05-44593; Delphi Automotive Systems (Holding), Inc. 05-44596; Delco Electronics Overseas Corporation 05-44610; Delphi Diesel Systems Corp. 05-44612; Delphi LLC 05-44615; Aspire, Inc. 05-44618; Delphi Integrated Service Solutions, Inc. 05-44623; Delphi Connection Systems 05-44624; Packard Hughes Interconnect Company 05-44626; DREAL, Inc. 05-44627; Delphi Automotive Systems Services LLC 05-44632; Delphi Services Holding Corporation 05-44633; Delphi Automotive Systems Global (Holding), Inc. 05-44636; Delphi Foreign Sales Corporation 05-44638; Delphi Automotive Systems Human Resources LLC 05-44639; Delphi Automotive Systems LLC 05-44640; Delphi Furukawa Wiring Systems LLC 05-47452; Delphi Receivables LLC 05-47459; and MobileAria, Inc. 05-47474.

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4. The person possessing ultimate authority to reconcile, settle, or

otherwise resolve the claim on Hutchinson's behalf is:

Sean Canty

Vice President and Chief Financial Officer

Of Hutchinson FTS, Inc.

5. Accordingly, Hutchinson's claim should be classified as a general

unsecured claim in the amount of \$274,165.53.

WHEREFORE, Hutchinson respectfully requests the Court enter an order

holding that the Twenty-Second Omnibus Objection as to Hutchinson's claim should be

granted to allow Hutchinson's Proof of Claim to be allowed as a general unsecured claim

in the amount of \$274,165, and, to provide for such other and further relief as the Court

deems just and proper.

Dated: New York, New York

November 21, 2007

HALPERIN BATTAGLIA RAICHT, LLP

Co-Counsel to Hutchinson FTS, Inc.

By: /s/ Christopher J. Battaglia

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